

**FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**[1] CHESTER GALLAGHER**

**[2] HEATHER IDONI**

**[3] CALVIN ZASTROW**

**[4] COLEMAN BOYD**

**[6] PAUL VAUGHN**

**[7] DENNIS GREEN**

**No. 3:22-CR-00327-2**

**JUDGE TRAUGER**

**NOTICE OF MANUAL FILING PURSUANT TO COURT'S ORDER**

Come now the Defendants, Chester Gallagher, Heather Idoni, Calvin Zastrow, Coleman Boyd, Paul Vaughn and Dennis Green, by and through undersigned counsel, and hereby give notice of the following manual submission of an electronic drive containing the portions of the videos the Defendants propose should be admitted in compliance with the Court's Order in Docket Entry 425. The portions of videos on the enclosed drive include the clips designated by the Government. Defendants believe that the whole of the submitted portions should be admitted under the rule of completeness notwithstanding any objection for hearsay as now authorized by the new amendment to Rule 106, Federal Rules of Evidence. The manual submission includes an electronic drive containing:

1. The entire video of Chester Gallagher<sup>1</sup> - with accompanying transcript.

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<sup>1</sup> The Defendants are willing to reduce the length of the videos if the Government will stipulate to the contents of the redacted portions, namely long periods of praying and singing hymns. Further, in compliance with the Court's prior orders on related issues, this version of the video removed a single sentence wherein the rescue at Sterling Heights, Michigan, was mentioned. See Gallagher video at approximately 1:30:30.

2. The first 25 minutes and 5 seconds of the video of Coleman Boyd<sup>2</sup> with accompanying transcript as well as
3. The majority of the WZTV video of Paul Vaughn with accompanying transcript.
4. The video from the clinic worker recorded from her cellular phone including the audio portion.

Defendants believe prior pleadings speak at greater length to the legal and factual basis for the admission of the videos contained on the electronic drive.

Respectfully submitted,

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<sup>2</sup> The defendants would agree to reduce the length of Mr. Boyd's video by eliminating the portion from 6:20 through 23:00 if the Government will stipulate that the eliminated portion was of Boyd reading scripture, preaching and engaging in religious speech and that he was in the same position at the scene of the alleged offense the entire time that he was there.

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Motion was filed electronically and served on the following by the EF/CME electronic filing system:

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This the 5<sup>th</sup> day of January, 2024.

/s/ William Conway  
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